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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

**PURDUE PHARMA L.P., et al.,
Debtors.¹**

Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

DECLARATION OF JASMINE BALL

DATED OCTOBER 14, 2020

I, Jasmine Ball, an attorney duly admitted to practice in the Southern District of New York, declare under penalty of perjury and pursuant to 28 U.S.C. § 1746:

1. I represent the Mortimer Sackler Initial Covered Sackler Persons (the “Mortimer Sackler ICSPs”) in this dispute.

¹ The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

2. I submit this declaration in support of the Mortimer Sackler ICSPs' opposition to the Official Committee of Unsecured Creditors' ("UCC") Motion to Compel Production of Purportedly Privileged Documents, or for *In Camera* Review, Based on Good Cause, Crime Fraud, and At Issue Exceptions to Claims of Privilege in the above captioned case and state that true and correct copies or excerpts of the following documents are attached as exhibits hereto:

3. Attached as Exhibit 1 is a rating evaluation service from Standard & Poors dated April 7, 2016, beginning with Bates number PPLPUCC9004774111.

4. Attached as Exhibit 2 is a portion of a presentation made to the Purdue Board of Directors dated April 5, 2016, bearing Bates numbers PPLPBN-00002642 and PPLPBN-00002644.

5. Attached as Exhibit 3 is a document laying out 2009 budget assumptions, beginning with Bates number PPLPC062000002121.

6. Attached as Exhibit 4 are the minutes from a December 2, 2010 meeting of the Purdue Board of Directors, beginning with Bates number PPLP004415773.

7. Attached as Exhibit 5 are notes taken by Anthony Roncalli regarding a call between the Purdue Board of Directors dated December 2, 2010, beginning with Bates number PPLPBN-00000471.

8. Attached as Exhibit 6 are the minutes from a June 24, 2011 meeting of the Purdue Board of Directors, beginning with Bates number PPLP004415824.

9. Attached as Exhibit 7 are notes taken by Anthony Roncalli regarding a meeting between the Purdue Board of Directors dated June 24, 2011, beginning with Bates number PPLBN-00000903.

10. Attached as Exhibit 8 is a financial statement prepared for Purdue by Ernst & Young in 2015, beginning with Bates number PPLPUCC9002668957.

11. Attached as Exhibit 9 is a copy of an email from Howard Udell to Ilene Sackler Lefcourt *et al.* dated January 27, 2007, beginning with Bates number PPLPC044000010048.

12. Attached as Exhibit 10 is a quarterly report made to the Purdue Board of Directors dated July 15, 2008, beginning with Bates number PPLP004367297.

13. Attached as Exhibit 11 is a quarterly corporate compliance report made to the Purdue Board of Directors dated October 19, 2009, beginning with Bates number PPLP004402982.

14. Attached as Exhibit 12 is a quarterly report made to the Purdue Board of Directors dated April 21, 2010, beginning with Bates number PPLPC012000269476.

15. Attached as Exhibit 13 is a quarterly report made to the Purdue Board of Directors dated August 3, 2011, beginning with Bates numbers PPLP004366913.

16. Attached as Exhibit 14 is a quarterly report made to the Purdue Board of Directors dated July 27, 2012, beginning with Bates number PPLPC012000387481.

17. Attached as Exhibit 15 is a quarterly corporate compliance report made to the Purdue Board of Directors dated April 10, 2013, beginning with Bates number PPLP004409601.

18. Attached as Exhibit 16 is a July 19, 2012 compliance presentation made to the Purdue Board of Directors, beginning with Bates number PPLP004408046.

19. Attached as Exhibit 17 is Oct. 7, 2016, Douglas R. Jensen, Auditor's First Report on Purdue Pharma's ADD Program, beginning with Bates number PPLP004473667.

20. Attached as Exhibit 18 is Oct. 20, 2017, Douglas R. Jensen, Auditor's Second Report on Purdue Pharma's ADD Program, beginning with Bates number PPLP004473709.

21. Attached as Exhibit 19 is Oct. 19, 2018, Douglas R. Jensen, Auditor's Third and Final Report on Purdue Pharma's ADD Program, beginning with Bates number PPLP004473738.

22. Attached as Exhibit 20 are the materials provided to the Purdue Board of Directors for a meeting on January 15, 2016, beginning with Bates number PPLP004412586.

23. Attached as Exhibit 21 is the December 31, 1993 settlement document for the Beacon Trust, formerly known as the Reigo trust, beginning with Bates number MSF00008502.

Dated: October 14, 2020
New York, New York

By: /s/ Jasmine Ball
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